

In re: )  
)  
Ryan E. Purdy and Trisha R. Purdy, ) Case No.: 20-11704  
)  
) The Honorable Judge Janet S. Baer  
Debtor(s) ) Trustee Glenn Stearns  
)  
Hearing Date: August 5, 2022 at 9:30 a.m.

To:

Glen Stearns, Chapter 13 Trustee  
[mcguckin\\_m@lisle13.com](mailto:mcguckin_m@lisle13.com)

United States Trustee  
USTPRegion [IL.ES.ECF@usdoj.gov](mailto:IL.ES.ECF@usdoj.gov)

Ryan & Trisha Purdy  
0S464 River Glen Dr.  
West Chicago, Illinois 60185

SEE ATTACHED SERVICE LIST

### **NOTICE OF MOTION**

PLEASE TAKE NOTICE that on August 5, 2022, at 9:30 a.m., I will appear before the Honorable Janet S. Baer, or any judge sitting in that judge's place, and present the motion of Debtors for Motion to Approve Loan Modification, a copy of which is attached.

**This motion will be presented and heard electronically using Zoom for Government.**

No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

**To appear by video**, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and passcode.

**To appear by telephone**, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

**Meeting ID and password.** The meeting ID for this hearing is 160 731 2971 and the passcode is 587656. The meeting ID and passcode can also be found on the judge's page on the court's web site.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

Motion for Entry of Agreed Order

July 11, 2022

/s/ Derrick B. Hager  
Debtor's Attorney

Derrick B. Hager 6286310  
245 W. Roosevelt Rd.  
Building 15, Suite 119  
West Chicago, IL 60185  
630-587-7490  
[dirkhager@sbcglobal.net](mailto:dirkhager@sbcglobal.net)

**AFFIDAVIT OF SERVICE**

As an attorney, I certify under penalty of perjury that I mailed a copy of this notice (and the attached Motion and order) to the above listed persons or entities by depositing same in the U.S. Mail Post Office in West Chicago, Illinois 60185 on July 11, 2022, postage prepaid, addressed to the people or entity listed above or served by electronic transmission via the Clerk of the Court's office.

/s/ Derrick B. Hager

Debtor's Attorney

**SERVICE LIST**

Aes/cit08bbc  
Attn: Bankruptcy  
Po Box 2461  
Harrisburg, PA 17105

Alltran LP  
PO Box 4044  
Concord, CA 94524-4044

American Eagle Bank  
Attn: Bankruptcy  
556 Randall Road  
South Elgin, IL 60177

Chase Card Services  
Attn: Bankruptcy  
Po Box 15298  
Wilmington, DE 19850

Citibank/The Home Depot  
Citicorp Credit Svcs/Centralized Bk dept  
Po Box 790034  
St Louis, MO 63179

GC Services Limited Partnership  
PO Box 1280  
Oaks, PA 19456-1280

Illinois Department of Revenue  
PO Box 19286  
Springfield, IL 62794

Internal Revenue Service  
PO Box 7346  
Philadelphia, PA 19101

Marinosci Law Group  
134 N. LaSalle St. #1900  
Chicago, IL 60602

The Money Source Inc.  
500 South Broad Street  
Suite 100A  
Meriden, CT 06450

US Bank/RMS CC  
Attn: Bankruptcy  
Po Box 5229  
Cincinnati, OH 45201

USAA Federal Savings Bank  
Attn: Bankruptcy  
10750 Mcdermott Freeway  
San Antonio, TX 78288

Zwicker & Associates PC  
7366 N. Lincoln Ave. Suite 102  
Lincolnwood, IL 60712

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**MOTION TO APPROVE LOAN MODIFICATION**

NOW COMES DEBTORS, by and through their attorney, Derrick B. Hager, and moves this court for Entry of an Order Approving Loan Modification entered into with The Money Source, for the reasons stated below.

1. Debtors filed their Chapter 13 petition on May 29, 2020.
2. All Schedules and Statements have been filed.
3. The Debtors' Plan was confirmed on July 31, 2020.
4. Debtors have filed a Motion to Modify their Chapter 13 Plan to add language to Section 8.1 that they intend to pursue mortgage modification under the Chapter 13 Mortgage Modification Mediation Program and to provide for treatment of the lender's claim during the mediation.
5. On February 4, 2022 Debtors filed a Notice of Intent to Participate in the Court Supervised Loan Modification Mediation Program as Document number 40 which included the requisite Certification of Readiness and Counsel's Certification of Qualification and DDM Portal Certification of Document Preparation.
6. Debtors' residential mortgage lender, The Money Source, Inc., through counsel, has agreed to participate in the Chapter 13 Mortgage Modification Mediation Program.
7. Debtors have successfully completed their Trial Loan Modification payments and have been offered a permanent loan modification by The Money Source.
8. Debtors believe accepting the Loan Modification is in their best interest as it resolves any and all pre-bankruptcy and post-bankruptcy mortgage arrears rendering them current in monthly payments and the slight increase in monthly payment is affordable within their Chapter 13 budget.

WHEREFORE, Debtor respectfully requests that this Court enter an order Approving Loan Modification.

July 11, 2022

Ryan E. Purdy and Trisha R. Purdy, Debtors,

/s/ Derrick B. Hager

Debtor's Attorney

Derrick B. Hager 6286310  
245 W. Roosevelt Rd.  
Building 15, Suite 119  
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